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IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE DISTRICT OF PUERTO RICO

2015 OCT -6 PM 1:57

In re:  
IRIZARRY RODRÍGUEZ JORGE A.  
Debtor(s)

U.S. BANKRUPTCY COURT  
FOR THE DISTRICT OF  
PUERTO RICO  
No. EAG-15-01937  
Chapter 13

**MOTION TO AMEND PLAN**

TO THE HONORABLE COURT:

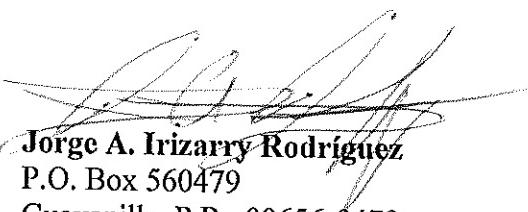
COMES NOW debtor Jorge A. Irizarry Rodríguez and very respectfully states and prays:

Debtor filed an amended plan dated October 5, 2015 to provide priority payments to IRS and the Department of Treasury.

**WHEREFORE**, the debtor respectfully prays that the amended Chapter 13 payment plan are accepted for continuation of the proceedings and that all other remedies that are proper and just be granted.

**CERTIFICATE OF SERVICE:** I hereby certify that on the same date I filed the above document with the Clerk of the Court I served all the parties involving this case by depositing true and exact copies thereof in the United States Mail, postage prepaid, to their mailing addresses of record.

RESPECTFULLY SUBMITTED,  
In Ponce, Puerto Rico. This 5<sup>th</sup> of October, 2015.

  
Jorge A. Irizarry Rodriguez  
P.O. Box 560479  
Guayanilla, P.R., 00656-0479  
Tel. 787-637-8716 / Fax. 787-873-2072  
E-mail: lcdo.jirizarry@gmail.com

LIST OF CREDITORS

15-01937-EAG13|Department of Treasury | Bankruptcy Section (424)|P.O. Box 9024140|San Juan PR 00902-4140| ||  
15-01937-EAG13|ARCELIO A MALDONADO AVILES |6 GARZAS|ADJUNTAS PR 00601-2108| ||  
15-01937-EAG13|ASUME |C/O STACY RODRIGUEZ VEGA|PO BOX 70376|SAN JUAN PR 00936-8376| ||  
15-01937-EAG13|ASUME |PO BOX 70376|SAN JUAN PR 00936-8376| ||||  
15-01937-EAG13|BANCO POPULAR DE PUERTO RICO |BANKRUPTCY DEPARTMENT|PO BOX 366818|SAN JUAN PR 00936-6818| ||  
15-01937-EAG13|DEPARTAMENTO DE HACIENDA DEL ESTADO LIBRE AS|EDIFICIO INTENDENTE RAMIREZ|10 PASEO COVADONGA|SAN JUAN 00901-2613| ||  
15-01937-EAG13|MARTIN GONZALEZ VAZQUEZ |PO BOX 591|MERCEDITA PR 00715 0591| ||||  
15-01937-EAG13|PONTIFICAL CATHOLIC UNIVERSITY PR |2250 BOULEVARD LUIS A FERRE|AGUAYO SUITE 530|ponce PR 00717| ||  
15-01937-EAG13|STACY M. RODRIGUEZ VEGA |PO BOX 2694|SAN GERMAN PR 00683-2694| ||||  
15-01937-EAG13|Synchrony Bank |c/o of Recovery Management Systems Corp|25 S.E. 2nd Avenue, Suite 1120|Miami, FL 33131-1605| ||  
15-01937-EAG13|UNIVERSIDAD CATOLICA DE PUERTO RICO |2250 BULEVARD LUIS A FERRE|ponce PR 00717-0656| ||||

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE: JORGE ANTONIO IRIZARRY RODRIGUEZ

BK. CASE # 15-01937 EAG

DEBTOR(S)

CHAPTER 13

## CHAPTER 13 PAYMENT PLAN

**NOTICE:** • The following plan contains provisions which may significantly affect your rights. You should read this document carefully and discuss it with your attorney. When confirmed, the plan will bind the debtor and each creditor to its terms. Objections must be filed in writing with the Court and served upon the debtor(s), debtors' counsel, the confirmation Plan Modifications, objections must be filed and notified in the same manner within twenty (20) days from its notification. • This plan does not allow claims. Any party entitled to receive disbursements from the Trustee must file a proof of claim. The Trustee will pay the allowed claims, as filed, provided for in the plan, unless disallowed or expressly modified by the Court and / or the terms of the plan. If no claim is filed, the Trustee will not pay a creditor provided for in the plan, unless ordered by the Court. If the Trustee is to make POST-PETITION REGULAR MONTHLY PAYMENTS to any Secured obligation, then a proof of claim must be filed including the following information: account number, address, due date and regular monthly payment. Secured creditor must notify any change in the monthly payment, three (3) months prior to the effective date of new payment. Those post-petition monthly payments will not exceed the life of the plan. • See the notice of commencement of case for 341 meeting date and claims bar date, the latter is the date by which a proof of claim must be filed in order to participate of the plan distribution.

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee:
  directly  by payroll deductions, as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.
3. The Confirmation Order will not vest property of the Estate on Debtor(s) until the Order discharging Debtor(s) is entered.

PLAN DATED:  PRE  POST-CONFIRMATION

I. PAYMENT PLAN SCHEDULE			
\$ 260	x 5	= \$ 1,300	
\$ 435	x 55	= \$ 23,925	
\$ _____	x _____	= \$ 0	
\$ _____	x _____	= \$ 0	
\$ _____	x _____	= \$ 0	
TOTAL = 60	\$ 25,225		

Additional Payments:

\$ \_\_\_\_\_ to be paid as a LUMP SUM  
within \_\_\_\_\_ with proceeds to come from

Sale of property identified as follows:  
\_\_\_\_\_

Other: \_\_\_\_\_

Periodic Payments to be made other than and in addition to the above:

\$ \_\_\_\_\_ x \_\_\_\_\_ = \$ 0

To be made on: \_\_\_\_\_

PROPOSED PLAN BASE: \$ 25,225

## II. ATTORNEY'S FEES

To be treated as a § 507 Priority, and paid before any other creditor and concurrently with the Trustee's fees, unless otherwise provided:

- a. Rule 2016(b) Statement: \$ 0
- b. Fees Paid (Pre-Petition): (\$ 0 )
- c. R 2016 Outstanding balance: \$ 0

d. Post Petition Additional Fees: \$ \_\_\_\_\_

e. Total Compensation: \$ 0

Signed:   
DEBTOR JORGE ANTONIO IRIZARRY RODRIGUEZ

JOINT DEBTOR \_\_\_\_\_

AMENDED PLAN DATED: October 5, 2015

FILED BY  DEBTOR  TRUSTEE  UNSECURED CREDITOR

## III. DISBURSEMENT SCHEDULE SEQUENCE

- A. SECURED CLAIMS:  Debtor represents that there are no secured claims.  
 Secured creditors will retain their liens and shall be paid as follows:

ADEQUATE PROTECTION Payments: Cr. \_\_\_\_\_ \$ \_\_\_\_\_

Trustee will pay secured ARREARS:

Cr. _____	Cr. _____	Cr. _____
Acct. _____	Acct. _____	POC _____
\$ _____	\$ _____	\$ _____

Trustee will pay REGULAR MONTHLY PAYMENTS:  
(please refer to the above related notice, for important information about this provision)

Cr. _____	Cr. _____	Cr. _____
Acct. _____	Acct. _____	Acct. _____
Monthly Pymt. \$ _____	Monthly Pymt. \$ _____	Monthly Pymt. \$ _____

Trustee will pay IN FULL Secured Claims:

Cr. _____	Cr. _____	Cr. _____
\$ _____	\$ _____	\$ _____

Trustee will pay VALUE OF COLLATERAL:

Cr. _____	Cr. _____	Cr. _____
\$ _____	\$ _____	\$ _____

Secured Creditor's interest will be insured. INSURANCE POLICY will be paid through plan:

Cr. _____	Ins. Co. _____	Premium: \$ _____
(Please indicate in "Other Provisions" the insurance coverage period)		

Debtor SURRENDERS COLLATERAL TO Lien Holder:

Debtor will maintain REGULAR PAYMENTS DIRECTLY to:

ASUME

B. PRIORITIES. The Trustee will pay §507 priorities in accordance with the law [§1322 (a)(2)].

IRS, ASUME, PR TREASURY, *Jorge M. Rodriguez Vega*

C. UNSECURED PREFERRED: Plan  Classifies  Does not Classify Claims.

Class A:  Co-debtor Claims:  Pay 100% /  Pay Ahead: \_\_\_\_\_

Class B:  Other Class: \_\_\_\_\_

<input type="checkbox"/> Cr. _____	<input type="checkbox"/> Cr. _____	<input type="checkbox"/> Cr. _____
\$ _____	\$ _____	\$ _____

D. GENERAL UNSECURED NOT PREFERRED: (Case Liquidation Value = \$ \_\_\_\_\_)

Will be paid 100% plus \_\_\_\_ % Legal Interest.  Will be paid Pro-Rata from any remaining funds

## OTHER PROVISIONS:

ATTORNEY FOR DEBTOR \_\_\_\_\_ Phone: \_\_\_\_\_